

REMARKS/ARGUMENTS

This paper is submitted in reply to the Office Action dated May 6, 2005. In the Office Action, claims 5-12 and 43-50 were rejected under 35 U.S.C. § 102(e) as being anticipated by Guheen (U.S. Patent No. 6,473,794).

Rejections Under 35 U.S.C. § 102(e)

With respect to the rejection of the claims under 35 U.S.C. § 102(e) as being anticipated by Guheen, Applicants respectfully traverse this rejection in view of the reasons that follow.

Independent claim 1 describes a “method for protecting a network server from being used as the basis of an attack on a network client.” The method comprises:

- a. restricting access to said network server to a portion of said network server for at least a selected protocol; and
- b. scanning said portion of said network server for particular characters, said particular characters being associated with said selected protocol.

Independent claim 43 describes a “computer-implemented method for protecting a network server from being used as the basis of an attack on a network client.” The method comprises:

- a. receiving a request for a connection at said server from said network client; and
- b. scanning a portion of said network server for particular characters associated with said selected protocol;
- c. verifying that any response from said network server to said network client is void of said particular characters; and
- d. providing said response from said network server to said network client.

With respect to independent claims 1 and 43, the Examiner fails to explain how Guheen even remotely teaches the claimed invention. Specifically, with respect to claim 1 and the element of claim 1 of “restricting access to said network server to a portion of said network server for at least a selected protocol,” the Examiner cites column 17, Directory Services and column 276, line 34 to column 277, line 24. These citations to Guheen, however, fail to teach or disclose the claimed invention as claimed in independent claim 1.

Specifically, Guheen, at column 17, Directory Services, describes:

a multi-protocol, scalable global directory for storing information such as user definitions, user profiles, network resource definitions, and configuration parameters. It employs naming, directory, and authentication protocols on top of a shared, distributed, object repository. Users and applications can use the directory to locate and access information from anywhere in the network.

Contrary to the Examiner's assertion, this cited excerpt fails to show that Guheen teaches "restricting access to said network server to a portion of said network server for at least a selected protocol." In fact, Guheen appears to teach the opposite, stating "Users and applications can use the directory to locate and access information from anywhere in the network." Col. 17, "Directory Services," lines 4-5.

In addition, the Examiner cites column 276, line 34 to column 277, line 24 to support, without further explanation, the assertion that Guheen teaches "restricting access to said network server to a portion of said network server for at least a selected protocol," as defined in independent claim 1. In this excerpt, Guheen merely teaches "a general purpose, secure, component based content control and distribution system." Col. 276, lines 34-35. The functions of the system "interact with non-secure transaction management operating system functions to properly direct transaction processes and data related to electronic information security, usage control, auditing, and usage reporting." Col. 277, lines 18-21. However, these functions merely relate to proper direction of transaction processes and data relating to security, and do not relate to "restricting access to said network server for at least a selected protocol," as recited in Claim 1.

In addition, the Examiner cites column 19, "Product 2 ISP Server Bundle" for support to demonstrate that Guheen teaches, "scanning said portion of said network server for particular characters, said particular characters being associated with said selected protocol," as recited in

independent claim 1. However, Guheen fails to teach this element of independent claim 1 in column 19. Specifically, the “Product2 ISP Server Bundle” in column 19 merely states:

Targeted for internet service providers, Business 1’s Product2 ISP Server provides users with a bundle of platform extensions including the following:

Internet Administrator – provides secure, remote management of distributed ISP services

Internet Services Monitor – monitors Internet services, identifies and manages network problems

Directory Services – provides a multi-protocol, global directory for storing information

Host configuration – provides ISP host configuration features including quick, repeatable installation, Product 2 security configuration, intrusion detection, server process monitoring, and log file management.

Product4 SKIP – provides encryption and key management capabilities which enables PCs, workstations, and servers to achieve secure/authenticated communication.

Again, the Examiner cites this excerpt of Guheen, and, without further explanation, asserts that it discloses “scanning said portion of said network server for particular characters, said particular characters being associated with said selected protocol.” However, nothing in the cited excerpt from Guheen relates to this element. The only security features taught by Guheen in this excerpt include “intrusion detection” and “encryption and key management capabilities,” but neither of these relates to “scanning said portion of said network server for particular characters, said particular characters being associated with said selected protocol,” as recited by claim 1.

With respect to independent claim 43, the Examiner cites FIGs. 87 and 88 to support the assertion that Guheen teaches the elements of independent claim 43. Specifically, independent claim 43 relates to “a computer-implemented method for protecting a network server from being used as the basis of an attack on a network client.” The method comprises:

- a. receiving a request for a connection at said server from said network client; and
- b. scanning said portion of said network server for particular characters associated with a protocol;

- c. verifying that any response from said network server to said network client is void of said particular characters; and
- d. providing said response from said network server to said network client.

However, while Guheen appears to disclose a security application in FIGs. 87 and 88, it is not the same as disclosed in independent claim 43. Specifically, FIG. 88, 2700 relates to “Allowing Browser-Based Authentication with User Verification Data.” Therefore, FIG. 88 relates to authenticating the submission using verification data. Verification data typically relates to a PIN, or other verification technique, and is utilized to establish authentication of the user. The present invention, however, relates to providing security by “scanning a portion of said network server for particular characters associated with a protocol” and “verifying that any response from said network server to said network client is void of said particular characters.” This security technique is intrinsically different than disclosed by Guheen, in that particular characters that may be hostile are detected and excised from any response between the network server and the network client. The user need not be authenticated to enable the security described in independent claim 43.

Under 35 U.S.C. § 102(e), anticipation requires that a single reference teach each and every element of Applicants’ claimed invention. *Akzo N.V. v. U.S. ITC*, 808 F.2d 1471, 1479 (Fed. Cir. 1986). Since Guheen fails to teach or disclose each of the elements of Applicants claimed invention, as defined in independent claims 1 and 43, the rejections thereto have been overcome and should be withdrawn.

Claims 6-12 depend from independent claim 5; and claims 44-50 depend from independent claim 43. These claims are further believed allowable over Guheen for the same reasons set forth with respect to their parent claims because each sets forth additional elements of Applicants’ novel methods.

CONCLUSION

In view of the foregoing remarks, Applicants respectfully submit that all of the claims in the Application are in allowable form and that the Application is in condition for allowance. If, however, any outstanding issues remain, Applicants respectfully urge the Examiner to telephone Applicants' undersigned attorney so that the same may be resolved and the Application expedited to issue. Applicants respectfully request the Examiner to indicate all claims as allowable and to pass the Application to issue.

Respectfully submitted,

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